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14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 NAVAJO HEALTH FOUNDATION – SAGE
17 MEMORIAL HOSPITAL, INC. (doing business
18 as “Sage Memorial Hospital”); an Arizona non-
19 profit corporation

20 Plaintiff,

21 v.

22 RAZAGHI DEVELOPMENT COMPANY,
23 LLC; a Nevada limited liability company (doing
24 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO
EXTEND TIME FOR
DEFENDANTS TO ANSWER
PLAINTIFF’S THIRD AMENDED
COMPLAINT [ECF NO. 192]**

(SECOND REQUEST)

25 IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-
26 1 and subject to this Court’s approval, that Defendants Razaghi Development Company,
27 LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an
28 extension of time up to and including April 14, 2023 (two weeks) to respond to Plaintiff’s

1 Third Amended Complaint (ECF No. 192) filed on May 20, 2022. On January 30, 2023, the
 2 Court issued its Ruling on Defendants' Motion to Dismiss the Third Amended Complaint
 3 (ECF No. 232), partially granting said motion and triggering the deadline for response.

4 The parties stipulate that there is good cause for the requested extension due to
 5 defense counsels' current case load including Mr. Uppal's upcoming trial in another matter
 6 (April 3, 2023 through April 6, 2023), Defendants' availability to assist in preparing the
 7 response and the other currently pending deadlines in this matter. This includes the multiple
 8 recent filings and responses necessary in this case over the last three weeks. As this court is
 9 aware, this matter involves a Third Amended Complaint that is 132 pages, with 278
 10 numbered paragraphs plus an additional 80 pages of subparts. Due to the reasons stated
 11 herein, Defendants require additional time to prepare their response thereto. This is the
 12 second request to extend Defendants' deadline to respond to the Third Amended Complaint
 13 following the Court's Ruling on the Motion to Dismiss (ECF No. 232).

14 This request is made in good faith and not for the purpose of delay. Neither party
 15 will be prejudiced by the requested extension.

16 For the reasons set forth above, the parties ask the Court to approve this stipulation
 17 and allow Defendants up to and including April 14, 2023 to respond to or otherwise answer
 18 the Third Amended Complaint (ECF No. 192).

19 RESPECTFULLY SUBMITTED this 30th day of March 2023.

20
 21 /s/ D. Samuel Coffman (with permission)
 22 Justin J. Bustos, Esq.
 23 D. Samuel Coffman, Esq.
 24 *Counsel for Plaintiff and Counterdefendant*

25 /s/ Kris Leonhardt
 26 Pavneet Singh Uppal, Esq.
 27 Kris Leonhardt, Esq.
 28 Nermana Pehlic, Esq.
 Jeffrey D. Winchester, Esq.
*Counsel for Defendants,
 Counterplaintiffs, and Third-Party
 Plaintiffs*

29 IT IS SO ORDERED:

30 
 31 Eayn J. Zouchah
 32 UNITED STATES MAGISTRATE JUDGE
 33 Dated: March 30, 2023